

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CAROLINE PATTON GRIFFIN,
Individually and as Surviving Spouse and
Executor of the Estate of
LEE DIXON GRIFFIN, JR.,

Plaintiff,

VS.

TOYOTA MOTOR CORPORATION;
TOYOTA MOTOR NORTH AMERICA,
INC.; TOYOTA MOTOR SALES U.S.A.,
INC.; TOYOTA MOTOR ENGINEERING
& MANUFACTURING NORTH
AMERICA, INC.; TOYOTA MOTOR
MANUFACTURING, TEXAS, INC.; and
JIM ELLIS AUTOMOTIVE HOLDINGS,
INC.,

Defendants.

CONSENT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

The parties respectfully ask the Court for an extension of the deadlines set forth in the Court's Scheduling Order, which was entered on May 13, 2024. This is the second request for an extension of the Scheduling Order.

Under the Court’s May 13, 2024 Scheduling Order (ECF 81), “all dispositive motions, including motions for summary judgment and Daubert motions, shall be filed by November 14, 2024.” The parties jointly ask the Court

to extend that deadline. As good cause for this request, the parties have agreed that Plaintiff may take the deposition of a defense expert witness on November 22, 2024, which was the first date that expert had available to be deposed and which falls after the deadline for filing Daubert motions and motions for summary judgment.

Accordingly, for good cause shown, the Parties respectfully request that the Court amend Paragraph 6 of the May 13, 2024 Scheduling Order (ECF 81) to state:

6. All dispositive motions, including motions for summary judgment and *Daubert* motions, shall be filed by January 3, 2025. All responses are due on January 24, 2025.

Respectfully submitted this 8th day of November, 2024.

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Counsel for Toyota Defendants

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

This 8th day of November, 2024.

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